



## DEPARTMENT OF EDUCATION

P.O. BOX 83720  
BOISE, IDAHO 83720-0027

DR. MARILYN HOWARD  
STATE SUPERINTENDENT  
PUBLIC INSTRUCTION

### **STATE GUIDANCE**

**To:** All Programs  
**From:** Tammy Ray, M.Ed., Coordinator – NSLP/Commodities  
**Date:** July 18, 2006  
**Subject:** Monitoring SFA Implementation of HACCP-Based Food Safety Program  
**Policy Memo SP-25-2006**

This memorandum provides interim guidance to the State Agencies (SAs) on monitoring school food authority (SFA) implementation of the food safety program required by the Child Nutrition and WIC Reauthorization Act of 2004. As you know, the law required implementation of the school food safety program in the SY 2005-2006. FNS anticipates that by now most SFAs have implemented or are close to completing implementation of the program at each food preparation and service facility under their jurisdiction. The guidance material intended to help SFAs develop the food safety program was distributed to all SFAs in June 2005 ("Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles").

The SMI review forms have been revised and the CRE instruction manual is being revised to incorporate food safety in the general review area. Until revised CRE instructions are issued, SAs should take the following steps to confirm implementation of the food safety program:

- 1) Review the written food safety program to ensure that it follows the FNS guidance cited above. (Although USDA recommends that SFAs follow the Process Approach to HACCP, they may use the traditional approach to HACCP if the resulting food safety program is consistent with the June 2005 guidance.) The food safety program must address Standard Operating Procedures and the HACCP principles described in the guidance.
- 2) Examine food safety records from the review site to determine if the written program is operational. Documents to review may include food preparation process charts, temperature logs, and descriptions of standard operating procedures.
- 3) Review HACCP training plans and records to assess their adequacy and to verify employee participation.

SAs must foster compliance through training and technical assistance to the SFAs. The National Food Service Management Institute is available to provide technical assistance to SFAs upon request from the SA. State and local public health agencies may also be able to assist with training, although they have no specific responsibility in regard to this program requirement.

For further information call the Child Nutrition Division at 208-332-6820